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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

James M. Herndon,

Plaintiff,

vs.

City of Henderson, a political subdivision of The State of Nevada; **Sgt. M. Gillis,** individually and in his official capacity as a police officer; **Officer L. Good,** individually and in his official capacity as a police officer; **Officer A. Nelson,** individually and in his official capacity as a police officer; **Officer D. Nerbonne,** individually and in his official capacity as a police officer; **Officer D. Russo,** individually and in his official capacity as a police officer; **Officer E. Vega,** individually and in his official capacity as a police officer; Doe Officers I through X, inclusive and Roe Entities I through X, inclusive

CASE NO.: 2:19-cv-00018-GMN-VCF

Stipulation and Order to Extend Response to Defendants, City of Henderson and Sgt. M. Gillis's Motion for Summary Judgment [ECF No. 119]



Defendants.

Plaintiff, James Herndon, through his counsel of record, Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq., of H & P LAW, and Defendants, City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record, Craig R. Anderson, Esq. and Reagan A. Weber, Esq. of MARQUIS AURBACH, do hereby stipulate and agree to extend the due date of Plaintiff's Response to Defendants, City of Henderson and Sgt. M. Gillis's Motion for Summary Judgment [ECF No. 119].

Currently, Plaintiff's Response is due March 17, 2023. Plaintiff and Defendant agree to extend the Deadline for Plaintiff to file his Response to March 24, 2023. The extension is being requested in good faith and not for the purpose of delay. The extension is being requested as the issues to be briefed are extensive and complicated. In addition to Plaintiff's counsel, Marjorie Hauf, Esq. being in a 3-day binding arbitration earlier this month, Matthew G. Pfau, Esq. has been unavailable the last two weeks. These circumstances unfortunately delayed Plaintiff's efforts to respond to Defendant's Motion.

Stipulation

It is hereby STIPULATED between James Herndon, through his counsel of record, Marjorie L. Hauf, Esq. and Matthew G. Pfau, Esq., of H & P LAW, and Defendants, City of Henderson, Sgt. M. Gillis, Officer L. Good, Officer A. Nelson, Officer D. Nerbonne, Officer D. Russo, and Officer E. Vega through their counsel of record, Craig R. Anderson, Esq. and Reagan A. Weber, Esq. of MARQUIS AURBACH, to extend the due date of Plaintiff's Response to Defendants, City of Henderson and Sgt. M. Gillis's Motion for Summary Judgment [ECF No. 119].



1 IT IS FURTHER STIPULATED that Plaintiff's Response to Defendants, City of
2 Henderson and Sgt. M. Gillis's Motion for Summary Judgment must be filed by March
3 24, 2023.

4 WHEREFORE, the parties respectfully request that the Court enter its order
5 extending the deadline as described in the stipulation above.

6 DATED this 16th day of March 2023.

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8 Respectfully submitted by:
9 H & P LAW

Approved as to form and content:
MARQUIS AURBACH

10 /s/ Marjorie Hauf
11 Marjorie L. Hauf, Esq.
12 Nevada Bar No.: 8111
Matthew G. Pfau, Esq.
Nevada Bar No.: 11439

/s/ Craig Anderson
Craig R. Anderson, Esq.
Nevada Bar No.: 6882
Reagan A. Weber, Esq.
Nevada Bar No.: 16151

13 Attorneys for Plaintiff,
14 James M. Herndon

Attorneys for Defendants,
City of Henderson and Sgt. S. Gillis

15 **Order**

16 IT IS SO ORDERED.

17 Dated this 17 day of March 2023.

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20 UNITED STATES DISTRICT JUDGE
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